

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>PARAGON DATA SYSTEMS, INC.,</b>	)	<b>Case No. 1:2020-CV-01883</b>
	)	
<b>Plaintiff,</b>	)	<b>Judge Dan Aaron Polster</b>
	)	
<b>-vs-</b>	)	<b>Magistrate Judge David Ruiz</b>
	)	
<b>CINTAS CORPORATION, et al.</b>	)	<b>DEFENDANT CINTAS</b>
	)	<b>CORPORATION'S NOTICE OF</b>
<b>Defendants.</b>	)	<b>JOINDER IN DEFENDANT SAP</b>
	)	<b>AMERICA INC.'S MOTION FOR CIVIL</b>
	)	<b>CONTEMPT SANCTIONS</b>

Defendant Cintas Corporation (“Cintas”), by and through counsel, hereby joins and adopts Defendant SAP America, Inc.’s (“SAP”) Motion for Civil Contempt and Sanctions (“Motion”) against Plaintiff Paragon Data Systems, Inc. (“Paragon”). (Dkt. # 52.)

As more fully stated in SAP’s Motion, Paragon, SAP, Cintas, and ACSIS, Inc. are parties to a Protective Order entered by this Court on October 14, 2020. (Dkt. # 28.) In relevant part, the Protective Order provides that the disclosure of confidential information produced by Cintas and SAP in this matter shall be limited to “Counsel for the parties and employees and agents of counsel who have responsibility for the preparation and trial of this action.” (Dkt. #28 at PageID 664.) The Protective Order further provides that confidential information produced in this action by Cintas and SAP shall not be used *or* disclosed “for any purpose whatsoever” other than to prosecute “this action.” (*Id.* at PageID 663.)

On October 12, 2022, Paragon’s new counsel filed a new case in the Court of Common Pleas, Cuyahoga County, Ohio. (*See* Dkt. # 52-2 at PageID 858.) Paragon’s state court Complaint names four Cintas employees in their individual capacity. (*Id.*) In relevant part, Paragon alleges that “[t]hrough discovery conducted during the pendency of the First Action [i.e.

this action], Paragon learned that” the four Cintas employees now named in the state court action allegedly engaged in unauthorized password sharing. (*Id.* at PageID 880.) The discovery referenced by Paragon in its newly filed Complaint consisted of confidential information produced by Cintas and/or SAP pursuant to the Protective Order. As SAP explains in its Motion, Paragon’s state court Complaint contains information that could only have been derived from documents that were designated as confidential by Cintas and/or SAP under the Protective Order. (Dkt. # 52-1 at PageID 841.)

For the reasons more fully stated in SAP’s Motion, Paragon has violated the Protective Order by disclosing confidential documents to its new counsel (who were not parties to the Protective Order) and using those confidential documents to file a separate, state court action. Accordingly, Cintas hereby joins and adopts SAP’s Motion and joins in the request for civil contempt sanctions set forth therein.

Respectfully submitted,

/s/ William N. Minor  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed with the Court's CM/ECF system on Fri, Nov 18, 2022. Notice of this filing will be sent to all counsel of record and may be accessed through the Court's system.

*/s/ William N. Minor*

William N. Minor

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